

ATTACHMENT 32

*** CONFIDENTIAL ATTORNEYS EYES ONLY ***

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SURGICAL INSTRUMENT SERVICE)
COMPANY, INC.,) Case No.:
) 3:21-cv-03496-VC
Plaintiff,)
) Lead Case No.:
vs.) 3:21-cv-03825-VC
)
INTUITIVE SURGICAL, INC.,)
)
Defendant)
_____)
IN RE: DA VINCI SURGICAL ROBOT)
ANTITRUST LITIGATION)
_____)
THIS DOCUMENT RELATES TO:)
ALL ACTIONS)
_____)

*** CONFIDENTIAL ATTORNEYS EYES ONLY ***

30(b)(6) DEPOSITION OF:

KEITH ROBERT JOHNSON

THURSDAY, OCTOBER 27, 2022

9:06 a.m. Mountain Standard Time

REPORTED BY:
Vickie Blair
CSR No. 8940, RPR-CRR
JOB NO. 5539883
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Deposition of KEITH ROBERT JOHNSON, the witness, taken
on behalf of the Defendant, on Thursday,
October 27, 2022, 9:06 a.m. Mountain Standard Time,
before VICKIE BLAIR, CSR No. 8940, RPR-CRR.

APPEARANCES OF COUNSEL VIA ZOOM:

FOR PLAINTIFF/COUNTER-DEFENDANT SURGICAL INSTRUMENT
SERVICE CO. INC.:

HALEY GUILIANO LLP

BY JOSHUA VAN HOVEN, Partner

111 North Market Street, Suite 900

San Jose, California 95113

+1 669 213 1061

joshua.vanhoven@hglaw.com

FOR DEFENDANT INTUITIVE SURGICAL, INC.:

COVINGTON & BURLING LLP

BY ISAAC D. CHAPUT, Associate

415 Mission Street

Suite 5400

San Francisco, California 94105-2533

+1 415 591 7020

ichaput@cov.com

COVINGTON & BURLING LLP

BY AUSTIN S. MARTIN, Associate

One CityCenter

850 Tenth Street, NW

Washington, D.C. 20001-4956

+1 202 662 5094

amartin@cov.com

1 APPEARANCES OF COUNSEL VIA ZOOM: (Continued)
2 FOR THE PROPOSED CLASS:

3 BONI, ZACK & SNYDER LLC
4 BY JOSHUA D. SNYDER, Partner
15 St. Asaphs Road
Bala Cynwyd, Pennsylvania 19004
5 (610) 822-0203
(610) 822-0206
6 jsnyder@bonizack.com
7

8 ALSO PRESENT:

9 RAMON A. PERAZA, Videographer
10
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1 components that are not found in traditional 09:36:22

2 laparoscopic instruments? 09:36:25

3 A From what aspect? 09:36:32

4 Q Any aspect. 09:36:34

5 A Well, I mean, the biggest one, like I 09:36:37

6 stated, is one is manually utilized with a surgeon's 09:36:41

7 hands, the other one is managed through a robot. 09:36:46

8 So, as far as size differences, a grasper 09:36:50

9 is a grasper, scissors are a scissor, monopolar, 09:36:56

10 bipolar, suction, for the most part, yes, they -- they 09:37:01

11 have the same functionality, but obviously are 09:37:07

12 manufactured differently just because of the fact that 09:37:12

13 one is used by a robot and one is held in a surgeon's 09:37:15

14 hand. 09:37:18

15 Q Are you familiar with the cables that 09:37:19

16 appear in Intuitive's EndoWrist instruments? 09:37:22

17 A Yes. 09:37:28

18 Q Do traditional laparoscopic instruments 09:37:28

19 have similar cables? 09:37:33

20 A No, they do not. 09:37:35

21 Q Does SIS have experience repairing or 09:37:43

22 inspecting laparoscopic instruments that contain 09:37:49

23 cables? 09:37:53

24 A No. 09:37:58

25 Q Prior to entering into the EndoWrist 09:37:59